



We believe that high standards of corporate responsibility make good business sense and have the potential to protect and enhance investment returns. Our tax affairs are managed in line with these standards and in keeping with our core values.

UK tax strategy

- The FIL Limited group (“FIL” or the “Group”) is a global financial services group, with an investment solutions and retirement savings business, trading as Fidelity International.
- Our UK tax strategy applies to all UK resident companies, branches and partnerships (“UK entities”) in the FIL Limited group.
- For this purpose, “UK tax” refers to corporate income tax, indirect tax, payroll and all other UK taxes set out in paragraph 15, Schedule 19, Finance Act 2016.

Tax Governance

- Responsibility for FIL’s governance framework, Group strategy including tax strategy and the management of tax risk ultimately sits with the FIL Limited Board. Day-to-day management of each of these areas is delegated to the Head of Tax Financial Services who reports to FIL’s General Counsel, with executive responsibility for FIL tax matters.
- Our UK tax strategy is subject to the approval of the FIL Holdings (UK) Limited (“FHL”) Board, which includes non-executive Directors offering independent oversight, and annual review by the UK Audit and Risk Committee, which also oversees relevant regulatory, tax and legal matters on behalf of the FHL Board.
- Our UK tax strategy is also subject to the approval of the FIL Life Insurance Limited (“FIL Life”) Board, which includes non-executive Directors offering independent oversight, and an annual review by the FIL Life Policy Approvals Committee.
- Our UK tax affairs are regularly reviewed by external auditors and by HMRC as part of the normal course of local tax compliance procedures.
- The operation of our UK tax strategy is supported by FIL’s governance structure and the Group’s Enterprise Risk Management framework.

Management of tax risk

The Group faces a variety of tax risks, including:

- Tax compliance and reporting risk;
- Transactional risks;
- Operational tax risk; and
- Reputational risk.

FIL's tax risk management procedures include:

- Clearly documented processes and controls relating to the management of UK tax in order to achieve full compliance with the UK Senior Accounting Officer regime. Processes and controls are subject to an annual review and are regularly updated to reflect business and legislative changes;
- The employment of appropriately qualified tax professionals within FIL's tax function;
- Dedicated oversight and management of operational tax risk;
- Where necessary, obtaining external advice from a network of specialist professional advisors in relation to areas of complexity or uncertainty;
- The integration of tax risk management into the Group's Enterprise Risk Management framework with associated assessment, monitoring and reporting procedures;
- Periodic review of tax risk management procedures by FIL's internal audit function.

Relationship with UK tax authorities

- We seek at all times to comply with our UK tax filing, tax reporting and tax payment obligations in line with statutory timelines.
- An important part of our UK tax strategy is the maintenance of a constructive and transparent relationship with HMRC. We seek to maintain an open dialogue with HMRC via regular meetings with our Customer Compliance Manager and we regularly provide updates on any changes or developments in business activities.
- It is possible that our views on appropriate tax treatment may differ from those of HMRC. If such circumstances arise, we aim to work proactively and constructively with HMRC in order to achieve a swift resolution.
- We may also seek HMRC's opinion on new legislation, or areas of uncertainty where appropriate.
- We engage with both HMRC and HM Treasury on UK and international tax policy matters, in order to promote efficient group, shareholder and/or client outcomes.

Our attitude to tax planning and risk appetite

- We conduct our tax affairs in a manner which ensures compliance with all relevant legal, regulatory, and fiscal obligations.
- We ensure that our tax planning is aligned with the commercial objectives of our business and our long-term business model.

- We will consider using tax incentives or tax planning opportunities in this context, taking into account our responsibilities towards our stakeholders, and where they do not carry significant reputational risk.
- We will also act in line with our enterprise-wide approach to managing risk exposures which include formalised risk policy and risk appetite statement approved by the FHL Board and the FIL Life Board.
- Remuneration packages for employees and directors are structured so that the proper amounts of tax and social security contributions are paid.

The publication of this UK tax strategy statement relates to the accounting period ended 31 December 2020 and is regarded as satisfying the statutory obligation in Para 19(2), Schedule 19, Finance Act 2016. It will be updated on an annual basis.